

# **Exhibit 32**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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**BLACK LOVE RESISTS IN THE RUST, et al.,**  
**individually and on behalf of a class of**  
**all others similarly situated,**

Plaintiffs,

vs.

1:18-cv-00719-CCR

**CITY OF BUFFALO, N.Y., et al.,**

Defendants.  
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**ORAL EXAMINATION OF ROBBIN THOMAS**

**APPEARING REMOTELY FROM**

**BUFFALO, NEW YORK**

Thursday, March 23, 2023

10:07 a.m. - 5:26 p.m.

pursuant to notice

REPORTED BY:

Luanne K. Howe

APPEARING REMOTELY FROM CUYAHOGA COUNTY, OHIO

DEPAOLO CROSBY REPORTING SERVICES, INC.  
716-853-5544

1 to a summons being issued for that being a violation  
2 for each individual occurrence.

3 Q So to make sure I understand correctly, for example,  
4 if four windows were tinted on the vehicle, the law  
5 required you to write four summonses?

6 MR. SAHASRABUDHE: Form.

7 A It's not a requirement, but the law stipulates that  
8 each window is supposed to be in compliance.

9 Q And in -- while you were on the Strike Force, was  
10 there a policy related to tinted window violations?

11 A I don't remember what year there was -- when there  
12 was a focus on -- a focus became on tinted windows  
13 for some officer safety issues. I don't remember  
14 when it was, but I know that we received instruction  
15 from the Buffalo Police Training Academy about  
16 vehicle and traffic stops on vehicles that were  
17 heavily tinted.

18 Q Did you ever receive any separate instruction from  
19 your Strike Force leadership about vehicle and  
20 traffic stops on vehicles that were heavily tinted?

21 A I don't remember that being the case.

22 Q And did Strike Force have any policy stating whether  
23 it was appropriate to write one citation per vehicle

1 STATE OF OHIO )

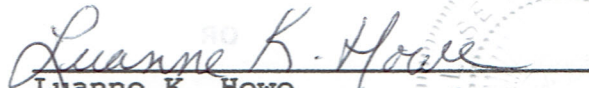
2 COUNTY OF CUYAHOGA )

3 I, Luanne K. Howe, Notary Public, in and for the  
4 County of Cuyahoga, State of Ohio, do hereby certify:

5 That the witness whose testimony appears  
6 hereinbefore was, before the commencement of his testimony,  
7 duly sworn to testify the truth, the whole truth and nothing  
8 but the truth; that said testimony was taken remotely  
9 pursuant to notice at the time and place as herein set  
10 forth; that said testimony was taken down by me and  
11 thereafter transcribed into typewriting, and I hereby  
12 certify the foregoing transcript is a full, true and correct  
13 transcription of my shorthand notes so taken.

14 I further certify that I am neither counsel for  
15 nor related to any party to said action, nor in any way  
16 interested in the outcome thereof.

17 IN WITNESS WHEREOF, I have hereunto subscribed my  
18 name and affixed my seal this 29th day of March, 2023.

19  
20   
21 Luanne K. Howe  
22 Notary Public - State of Ohio

23 My commission expires 10-27-24

DEPAOLO CROSBY REPORTING SERVICES, INC.  
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